

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARTINA ARCEAUX

Plaintiff,

v.

CITY OF HOUSTON

Defendant.

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CIVIL ACTION NO. 4:23-cv-904

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

- 1) Does anyone know the attorneys, parties, witnesses or a family member of any of these?
 - a. Sara Richey, Attorney for Plaintiff
 - b. Martina Arceneaux, Plaintiff
 - c. Lucy Chukwurah, Attorney for City of Houston
- 2) Has anyone ever worked for the City of Houston?
 - a. If so, in what capacity?
 - b. If so, because of that experience, do you feel that you bring some expertise in deciding this case that some of the other jurors may not have?
- 3) Does anyone have a close family member or friend who has ever worked for the City of Houston?
 - a. If so, in what capacity?

- b. If so, because of that experience, do you feel that you bring some expertise in deciding this case that some of the other jurors may not have?
 - c. Is there anything about that relationship that would impact your ability to be a fair and impartial juror in this case?
- 4) Have you or someone close to you ever claimed to have suffered discrimination in the workplace?
- 5) Have you ever filed a complaint with the Equal Employment Opportunity Commission or the Texas Commission on Human Rights?
- 6) Do you believe gender discrimination exists in the workplace?
- 7) Do you believe men are inherently better supervisors than women?
- 8) Do you believe a woman should not be working in a job that requires you to get your hands dirty?
- 9) Has anyone here ever been accused of discrimination, retaliation or harassment, whether on your own time or at work?
- a. How did it make you feel?
 - b. Did you feel that you were wrongly accused of discrimination or harassment?
 - c. Were you angry at the person who complained?
- 10) Does anyone feel that there are simply too many lawsuits?

- a. Too many lawsuits against companies in general?
 - b. Too many lawsuits filed by employees against employers?
 - c. Too many discrimination lawsuits?
- 11) Have you ever served on a jury before?
- 12) Have you ever served as a juror in a criminal case?
- 13) Do you understand that in a civil case a plaintiff only has the burden of proving its case by a preponderance of the evidence, whereas in a criminal case the burden of proof is to prove the case beyond a reasonable doubt?
- 14) Does anyone here feel that the fact that this case is brought against a governmental entity will impact your ability to be a fair juror?
- 15) Does anyone have a religious, moral, or philosophical opposition to awarding damages against a governmental entity if the evidence warrants a finding of damages?
- 16) Who is your favorite President in history and why?

Respectfully submitted,

By: /s/Sara Richey
Sara Richey
11777 Katy Freeway, Suite 335
Houston, TX 77079
Phone: (713) 636-9931
Email: sara@thericheylawfirm.com